

ARGUMENTS**1. Claims 1-5, 9-14, and 18 are rejected under 35 U.S.C. 102(b) as being anticipated by Fetherolf et al. (US 6,511,241)**

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Response:

Claim 1

Examiner stated that Fetherolf's Fig. 3 shows a positioning apparatus 50 coupled to the cover 12 for controlling movement of the cover. However, applicants deem that Examiner

10 misinterpreted Fetherolf's teachings. Fetherolf discloses "When the door 12 is opened, as illustrated in FIG. 4, the door pivots away from the printer (outward, forward), which pulls the connection point between door 12 and linkage bar 50 forward and downward in a vertical arc equal to the amount of pivot of the door. The linkage bar 50 is therefore pulled by the door forward and downward, which slides the bar down and pivots the 15 bar lower end out (Col. 6 and lines 48-54)" and "rotational motion of the door 12 is translated to linear motion of the linkage bar 50, and linear motion of the linkage bar 50 is translated to rotational motion of the diverter 40 (col. 6, line 66 to col. 7, line 2)." Therefore, the movement of the door 12 is not controlled by the linkage bar 50, automatically. Instead, the movement of the door 12 is controlled by a user, manually.

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In short, Fetherolf fails to teach or suggest the claimed feature "a positioning apparatus coupled to the cover for controlling movement of the cover." Applicants believe that the 35 U.S.C. 102(b) rejections are overcome. Reconsideration of claim 1 is respectfully requested.

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As to Fox's disclosure (US 5,525,031), Fox teaches "Automatic job sets (bin contents) ejectors 109 may also be provided in each bin 11 to push out the print job sets therein automatically after the door of that bin has been automatically opened by that or some other system (col. 7, lines 17-21)" and "The delivery bins units 120 may have plural mail

bins 121 with normally locked covers or doors 122 which then automatically open to receive the print jobs ejected from the mailbox unit 20 bins 11 by their ejectors 109 through their unlocked bin privacy doors 52." Therefore, an ejector 109 pushes out the print job sets stored in a corresponding bin 11 automatically each time a door 52 of the

5 bin 11 is opened. In addition, as disclosed in the ABSTRACT, the mailbox bins may have lockable access restricting privacy doors respectively electronically unlockable by user access codes, which may be automatically provided at the job receiving sites by digital signal sources there. Therefore, if the access restricting privacy doors 52 are

10 unlocked when the printer is printing, the corresponding ejectors 109 are actuated to push out the print jobs stored in the corresponding bins 11, making the print jobs erroneously dumped before delivered to particular remote sites. It is clear that Fox's teachings imply that the access restricting privacy doors 52 are locked when the printer is printing to guarantee that the print jobs to be delivered are secured in the bins. In addition, as mentioned above, Fetherolf's apparatus is designed to convert the rotational motion of the

15 door 12 into linear motion of the linkage bar 50. Therefore, it is clear that modifying Fetherolf's apparatus by referencing Fox's teachings is sure to change original operation of Fetherolf's apparatus. Therefore, it is not obvious to one of ordinary skill in this art to combine Fetherolf's and Fox's teachings to anticipate all limitations in claim 1.

20 As to Pearce's disclosure (US 3,009,458), Pearce discloses a door mechanism having a motor 54 to control the movement of the covers 20, 24. However, as mentioned above, Fetherolf's apparatus is designed to make the movement of the door 12 controlled by a user, manually. Similarly, it is clear that modifying Fetherolf's apparatus by referencing Pearce' teachings is sure to change original operation of Fetherolf's apparatus. Therefore, it is not obvious to one

25 of ordinary skill in this art to combine Fetherolf's and Pearce' teachings to anticipate all limitations in claim 1.

As to Tainer's disclosure (US 6,249,299), Tainer does not teach any door mechanisms. Therefore, combining Fetherolf's and Tainer's teachings fails to anticipate all limitations in

claim 1.

In summary, applicants believe that claim 1 has been placed in condition for allowance.

5 **Claims 2-5 and 9**

Claims 2-5 and 9 are dependent upon claim 1, and should be allowed if claim 1 is found allowable.

Claim 10

10 According to the arguments under Claim 1, Fetherolf fails to teach or suggest the claimed feature "a positioning apparatus coupled to the cover for controlling movement of the cover." Applicants believe that the 35 U.S.C. 102(b) rejections are overcome.
Reconsideration of independent claim 10 is respectfully requested.

15 **Claims 11-14 and 18**

Claims 11-14 and 18 are dependent upon claim 10, and should be allowed if claim 10 is found allowable.

2. Claims 1-3, 9-12, and 18 are rejected under 35 U.S.C. 102(b) as being anticipated by

20 **Fox (US 5,525,031)**

Response:

Claim 1

Examiner stated that Fox's Fig. 3 shows a positioning apparatus 50 coupled to the cover 52

25 for controlling movement of the cover and the positioning apparatus controls the cover to not block the access opening if the printer is printing. However, applicants deem that Examiner misinterpreted Fox's teachings. According to arguments under above Claim 1, Fox's teachings imply that the access restricting privacy doors 52 are locked when the printer is printing to guarantee that the print jobs to be delivered are secured in the bins.

Therefore, Fox fails to teach or suggest the claimed feature "the positioning apparatus controls the cover to not block the access opening if the printer is printing." Applicants believe that the 35 U.S.C. 102(b) rejections are overcome. Reconsideration of independent claim 1 is respectfully requested.

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In addition, referring to arguments under above Claim 1, it is not obvious to one of ordinary skill in this art to combine Fetherolf's and Fox's teachings to anticipate all limitations in claim 1.

10 As to Pearce's disclosure (US 3,009,458), Pearce discloses a door mechanism having a motor 54 to control the movement of the covers 20, 24. However, as mentioned above, Fox's apparatus is designed to make the door locked when the printer is printing. Therefore, combining Fox's and Pearce' teachings fails to anticipate all limitations in claim 1.

15 As to Tainer's disclosure (US 6,249,299), Tainer does not teach any door mechanisms. Therefore, combining Fox's and Tainer's teachings fails to anticipate all limitations in claim 1.

In summary, applicants believe that claim 1 has been placed in condition for allowance.

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Claims 2-3 and 9

Claims 2-3 and 9 are dependent upon claim 1, and should be allowed if claim 1 is found allowable.

25 Claim 10

According to above arguments under Claim 1, Fox fails to teach or suggest the claimed feature "the positioning apparatus controls the cover to not block the access opening if the printer is printing." Applicants believe that the 35 U.S.C. 102(b) rejections are overcome. Reconsideration of independent claim 10 is respectfully requested.

Claims 11-12 and 18

Claims 11-12 and 18 are dependent upon claim 10, and should be allowed if claim 10 is found allowable.

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3. Claims 6, 7, 15, and 16 are rejected under 35 U.S.C. 103(a) as being unpatentable over Fox (US 5,525,031) in view of Pearce (US 3,009,458)

Response:

10 Claims 6, 7, 15, and 16 are dependent upon claim 1 and claim 10, respectively, and should be allowed if claim 1 and claim 10 are found allowable.

4. Claims 8 and 17 are rejected under 35 U.S.C. 103(a) as being unpatentable over Tainer (US 6,249,299) in view of Fetherolf et al. (US 6,511,241)

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Response:

Claims 8 and 17 are dependent upon claim 1 and claim 10, respectively, and should be allowed if claim 1 and claim 10 are found allowable.

20 Applicants respectfully request that a timely Notice of Allowance be issued in this case.

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Sincerely yours,

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Date: 03.01.2006

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10 Note: Please leave a message in my voice mail if you need to talk to me. (The time in D.C. is 13 hours behind the Taiwan time, i.e. 9 AM in D.C. = 10 PM in Taiwan.)